



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

ENVIRONMENTAL SERVICES DIVISION

60 WESTVIEW STREET, LEXINGTON, MASSACHUSETTS 02173-3185

Superfund Records Center

SITE: Ashland Drum

BR: 29

OTHER: 596812

MEMORANDUM

SUBJ: Request For Immediate Removal Action - ACTION MEMORANDUM
Ashland Drum Site, Ashland, Massachusetts

FROM: Thomas C. Condon, On-Scene Coordinator *TC*
Response and Prevention Section
Emergency Planning And Response Branch

TO: Michael R. Deland
Regional Administrator



SEMS DocID 596812

THRU: *for* Edward J. Conley, Director *EJ*
Environmental Services Division

Authorization is hereby requested for \$232,530 to commence a removal action at the Ashland Drum Site in Ashland, Massachusetts. Implementation of this action is necessary to prevent, minimize, and mitigate damage to the public health or welfare or the environment which may result from a release or threat of release of hazardous substances at the Site. Such damage includes exposure to hazardous materials and contamination of groundwater. This action would involve the removal of buried drums from an area in which a cap is to be constructed as part of the remediation of the Nyanza Hazardous Waste Site. The removal of these drums would contribute to the implementation of the planned remedy for the Nyanza Site.

On May 25, 1989, the On-Scene Coordinator, together with Regional program managers, consulted with Headquarters' staff regarding the segregation of this removal action from previous activities. Headquarters concurred with the OSC's intent to segregate this removal from past and on-going activities. The segregation of costs of this removal action is necessary because the area in which the removal is planned is remote from the two previous actions, the intended scope of work is patently different, and the potential for identification of additional potentially responsible parties exists.

The State of Massachusetts Department of Environmental Quality Engineering (DEQE) is unable to initiate a removal action. There are no responsible private parties willing to undertake the removal action.

E8-0040

Enforcement

See attached.

Background

The Ashland Drum Site is located within the boundaries of the Nyanza Site on Megunko Road in Ashland, Massachusetts. The Nyanza Site is a privately owned active industrial complex comprising of approximately 35 acres. Between 1917 and 1978, numerous companies manufactured textile dyes and intermediates at the Site. The last of these dye manufacturing companies was Nyanza, Inc. which operated from 1965 to 1978. The industrial wastes generated by these companies were partially treated and the resulting chemical sludges were disposed of on-site in unlined lagoons and an underground vault.

In 1978, Nyanza, Inc. ceased its operation at the Ashland facility. Since that time, the property has been involved in several ownership transfers and subdivisions. By early 1981, MCL Development Corporation had acquired much of the land. Currently, MCL leases the existing plant and operational facilities to Nyacol Products, Incorporated. The Nyanza Site is on the National Priorities List.

In December of 1982, the USEPA-Waste Management Division (WMD), in conjunction with the State of Massachusetts, commenced remedial planning activities. In May of 1989, the remedial contractor uncovered buried drums in an area which was being excavated for the construction of a cap in accordance with the Record of Decision for the Site. The EPA WMD requested that an On-Scene Coordinator evaluate the area containing the buried drums for a removal action.

In May of 1989, an OSC from EPA's Response and Prevention Section inspected the Site and collected samples from several of the exposed drums. Preliminary analysis of these samples indicate that the drums contain volatile organic chemicals, including toluene, benzene and trichloroethylene.

Current Remedial Status

The Record of Decision (ROD) for the Nyanza Site was signed on September 3, 1985. Phase I remedial activities focus on source control measures for metal sludge contamination. During the construction of a cell for on-

site containment of the metal sludge, the remedial contractor exposed an area containing buried drums. The proposed removal action will expedite the completion of Phase I remedial activities by eliminating the hazard presented by these drums, and will be consistent with Phase II remedial activities (remediation of contaminated groundwater).

Threat

The primary threat to public health and the environment is further contamination of groundwater and surface waters from deterioration of the drums. Existing data indicates that the groundwater in the area of the Nyanza Site is heavily contaminated with volatile organics. The extent of the contaminated plume has not as yet been identified, however the plume is known to run directly through the center of Ashland. The majority of residents in the town receive water from a municipal supply, however twenty-two residential wells in the vicinity of the Site have been identified. Recent sampling and analysis of these wells have indicated that they are suitable for domestic purposes.

On May 30, 1989, the Agency for Toxic Substances and Disease Registry (ATSDR) provided the OSC with a Health Consultation, in concurrence with the OSC's assessment of the situation as a potential threat to public health.

Proposed Removal Action

Removal actions planned involve excavation, sampling, analysis and disposal of an estimated 50 to 100 drums. Disposal options will be evaluated based upon volume of waste, and the chemical and physical characteristics of the waste. Preference will be given to those methods which will ensure ultimate destruction of the waste.

Removal Budget

Extramural Costs:

ERCS	\$130,000
15% Contingency	<u>19,500</u>
	\$149,500
 TAT Costs	 \$ <u>27,500</u>
 Total Extramural	 \$177,000
 <u>Intramural Costs</u>	
(Including Indirect)	\$ 25,200
 Total Costs	 \$202,200
Project Contingency 15%	<u>30,330</u>
 Total Project Costs	 \$ <u>232,530</u>

This action shall commence immediately upon authorization. The estimated period of performance is 150 to 180 days, dependant upon the disposal method.

REGIONAL ADMINISTRATOR RECOMMENDATION

Conditions at the Ashland Drum Site meet the NCP Section 300.65 criteria for a removal in that there is:

- * Potential exposure to hazardous substances ... by nearby populations ... [300.65(b)(2)(i)];
- * Potential contamination to drinking water supplies or sensitive ecosystems [300.65(b)(2)(ii)];
- * Hazardous substances ... in drums ... that may pose a threat of release [300.65(b)(2)(iii)];
- * Weather conditions that may cause hazardous substances ... to migrate or be released [300.65(b)(2)(v)]

I therefore recommend your approval of this removal request. The estimates total project costs are \$232,530, of which \$177,000 are for extramural cleanup contractor costs. You may indicate your approval or disapproval by signing below.

Approve: Paul Keough, DRA Date: June 1, 1989

Disapprove: _____ Date: _____